

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

JUL - 7 1992

Federal Communications Commission
Office of the Secretary

In the Matter of
Billed Party Preference
for 0+ Interlata Calls

CC Docket No. 92-77

ORIGINAL
FILE

RECEIVED

JUL 7 1992

COMMENTS
OF THE
FCC MAIL BRANCH
SOUTH CAROLINA JAIL ADMINISTRATORS ASSOCIATION

Dated: July 6, 1992

Name: Perry R. Eichor, Secretary
Address: S. C. Jail Administrators Association
P. O. Box 10171
Greenville, South Carolina 29603
Telephone: (803) 271-5260

No. of Copies rec'd
List A B C D E

07/12

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20544

RECEIVED

JUL - 7 1992

Federal Communications Commission
Office of the Secretary
CC Docket 92-77

In the Matter of
Billed Party Preference
for 0+ Interlata Calls

RECEIVED

JUL 7 1992

COMMENTS OF THE
SOUTH CAROLINA JAIL ADMINISTRATORS ASSOCIATION FCC MAIL BRANCH

COMES NOW, the South Carolina Jail Administrators Association ("SCJAA"), by its Secretary, Perry R. Eichor, hereby respectfully submits its Comments in response to the Notice of Proposed Rulemaking ("NPRM") issued by the Federal Communications Commission ("Commission") in the above-captioned rulemaking matter.

1. SCJAA is a professional association in the State of South Carolina, existing for the purpose of promoting:

- 1) The study and exchange of ideas for improving local Detention facilities;
- 2) Provide professionalism through training for local Detention officials;
- 3) Collecting, analyzing, and distributing needed information to local Detention facilities;
- 4) Promoting goodwill and integrity among those who serve in the correctional community.

The SCJAA presently has 66 members representing 46 county Detention facilities.

2. SCJAA has an interest in this rulemaking proceeding because of its potential impact upon the inmate pay telephones operated at the various SCJAA member jails.

3. It should be noted that SCJAA members are not aggregators,

rather SCJAA members enter into contracts with pay telephone vendors to supply pay telephones for inmate use. In the Matter of Policies and Rules Concerning Operator Service Providers, CC Docket No. 90-313, the Commission concluded "that the definition of 'aggregator' does not apply to correctional institutions in situations in which they provide inmate-only phones". An aggregator is defined as a provider of telephones to the public or to transient users. At present SCJAA's pay telephone vendors supply approximately 400 inmate pay telephones in jails for use by inmates. These telephones are restricted to placing collect (0+) telephone calls only. Inmates cannot originate calling card telephone calls, nor can inmates receive telephone calls.

4. SCJAA believes that the Commission must make a distinction between public access pay telephones and controlled access pay telephones. A public access pay telephone would be a pay telephone which is placed in any location with the intent of permitting any passerby who is a member of the general public to utilize the telephone. A controlled access pay telephone would be a pay telephone which is located in an area where the general public does not have access, such as a prison, jail or correctional institution. The SCJAA believes there is significant Federal precedent to support excluding controlled access phone service from Billed Party Preference ("BPP"). The Telephone Operator Consumer Services Improvement Act of 1990 (TOCSIA) passed by Congress required that all payphones allow callers to be able to reach the carrier of their choice by dialing the carriers access code

(Example: 10AT&T or 10288). Controlled access pay telephones or inmate pay telephones have been specifically excluded from this law by the FCC because of the potential for unlimited telephone fraud.

5. SCJAA, for obvious reasons, has a legitimate concern for maintaining the safety and security of its members institutions, the staffs, the inmates, and of course the public-at-large. Notwithstanding the most careful of precautions, some inmates perpetrate criminal activity from within the prison walls. One of the more-prevalent criminal activities being perpetrated by inmates within SCJAA member institutions is telephone fraud. Indeed, based upon data supplied by SCJAA members pay telephone vendors, even with validating all calls, approximately ten percent of telephone calls placed by inmates from within SCJAA member jails are fraudulently billed to unauthorized telephone numbers or are uncollectable because of subscription fraud.

6. SCJAA asserts that, no matter what other matters may be decided in this rulemaking, the Commission should and must create an exemption from requiring mandatory Billed Party Preference from controlled access pay telephones located inside jails or correctional institutions. SCJAA submits that there exists compelling security reasons for mandating this exemption.

7. The needs of jails and correctional institutions are unique in that the ability to control the criminal activity of those incarcerated therein is great. Inmates are perfectly willing to perpetrate crimes by telephone from the inside of prison and jail walls, even with electronic monitoring of the telephone calls.

8. A criminal activity perpetrated by inmates using telephones is to harass sentencing judges, prosecuting attorneys, jurors, witnesses, and others. SCJAA member facilities have installed automated equipment to block access to telephone numbers of parties who complain of unwanted inmate contact. For example, SCJAA member facilities have blocked the telephone numbers of jails to prevent inmates from harassing jail staff. Another specialized feature of in-jail equipment is the ability to permit inmate calling only to certain numbers designated in advance of the call. In-jail equipment can also place limits on the types and duration of calls to help guarantee equal availability of phone service to all inmates. By allowing inmates access through Billed Party Preference to various operator service providers, inmates would be able to circumvent the blocking of restricted telephone numbers and would be able to carry out their crimes of annoyance, harassment, and abuse by telephone.

9. Billed Party Preference will provide inmates with "easy access" to operator service providers without any call detail denoting the called number being generated on in-jail call detail recording equipment. Customized call detail reports by inmate, location called, number of calls, or other parameters are necessary to curtail criminal activity. These specialized requirements of inmate pay telephones and services provide the jails with control over the inmate calling. As an example, in a facility in North Carolina using automated collect inmate pay telephones, a murder suspect placed two phone calls immediately upon

returning to his cell following interrogation. Investigating officers were able to use call detail records generated by in-jail automated collect calling computers to locate and arrest accomplices in the murder case. Billed Party Preference would eliminate specialized in-jail monitoring of frequently dialed numbers. Daily monitoring of high volume indicators is critical in controlling criminal activity perpetrated during conference calling. By requiring Billed Party Preference for inmate pay telephones, the floodgates of potential criminal activity by the inmates will be opened wide, not the least of which will be untraceable access to criminal accomplices on the outside, and widespread fraudulent billing.

10. If inmate pay telephones are included in Billed Party Preference, the very features needed for provision of controlled access phone service would be defeated. Requiring calls from inmate pay telephones to be routed to the Local Exchange Carrier ("LEC") operator service switch and then to the operator service provider, would result in a loss of control of the call and the lack of special handling would result in increased fraud from institutions.

11. The idea of providing inmates with access to a multitude of different operator service provider companies by giving them access through Billed Party Preference gives rise to the conclusion that fraudulent billings will rise to several times their existing proportion. These same concerns were confirmed in a Telecommunications Industry Study on Inmate Phone Service (Exhibit A) requested by the North Carolina Utility Commission. This study was conducted by Southern Bell, General Telephone, seven

independent N.C. telephone companies and AT&T and U.S. Sprint. All of the conclusions of this study reinforced the need for enhanced fraud protection features located in customer premise or in-jail equipment. Important conclusions from this conference were:

"Despite the current restriction of collect only on most inmate lines, excessive toll fraud already exists due to ingenious schemes used by inmates to gain unauthorized access to toll networks."

"Due to technical limitations, some LEC's, and at least two IXC's, are unable to provide the specialized blocking and/or screening needed for inmate facilities."

Included with the Telecommunications Industry Study was a report by Larry Kepfer, Co-Chairman of The National Toll Fraud Prevention Committee ("NTFPC"), on "Industry Concerns with Prison Fraud." This report included information from the Communications Fraud Control Association ("CFCA") a national association of Inter-exchange Carriers, Local Exchange Companies, and law enforcement representatives. The conclusions of the NTFPC report confirmed the seriousness of the fraud control problem in jails.

"Local exchange carriers and interexchange carriers have sought to minimizing the fraud from inmate facilities through the provision of inmate service... Nonetheless, inmates still perpetrate fraud by using deceptive means to "Get By" the operator."

This conclusion further reinforces the need for in-jail fraud prevention features that are available with customer premise automated collect inmate pay telephones provided by private payphone vendors. The NTFPC report further concluded:

"Allowing 10XXX dialing from inmate lines would make Inter-exchange carriers who cannot separate

this type of traffic from POTS traffic, "fair game" for fraud."

Billed Party Preference would open the door to fraud in jails in the same manner that 10XXX dialing would. The official position of the National Toll Fraud Prevention Committee on Inmate Phone Service stated:

"This Committee has recommended that Inmate Service, regardless of the provider, allow 0+ Collect only. Deviance from this type of service will result in large amounts of fraud. TFPC issue 88-008 was agreement by the industry not to allow 10XXX dialing from inmate classes of service."

The Communications Fraud Control Association stated:

"Because of this history, increased calling patterns made available to the inmates will increase the opportunities to commit telephone fraud. Secondly, when inmates perpetrate the fraud, there is not a means for restitution. Allowing unrestricted local calling would give them access to services that would be compromised."

12. The problem of technical limitations of the Local Exchange Companies and Inter-exchange Carriers to provide specialized inmate call screening is prevalent in all states where there are small independent telephone companies. In South Carolina there are 29 telephone companies (Exhibit B) and only three of these telephone companies provide inmate call screening as an option. A large number of SCJAA member jails and many state prisons are located in rural areas serviced by telephone companies that do not provide inmate screening. Several long distance companies in South Carolina do not have the ability to offer inmate call screening. The net effect of Billed Party Preference to SCJAA member facilities would be the potential for high fraud and no

specialized in-jail equipment providing number blocking, number searches, etc.. An additional concern of several SCJAA members would be the inability to receive inmate phone service in rural areas where independent telephone companies do not provide this service.

13. The SCJAA believes that Billed Party Preference on controlled access pay telephones will eliminate private competition that provides in-jail automated collect inmate phone service. Without private competition the SCJAA believes our member facilities will lose the increased security, fraud prevention, inmate control and manpower savings that our member facilities now rely on.

14. For the foregoing reasons, SCJAA asserts that the Commission should and must exempt controlled access pay telephones located in prisons, jails, and other correctional institutions from being required to provide Billed Party Preference access to all carriers. SCJAA further asserts that such an exemption is necessary for the safety, security and well-being of the public-at-large.


WHEREFORE, THE PREMISES CONSIDERED, the South Carolina Jail Administrators Association respectfully requests the Federal Communications Commission to give careful and faithful consideration to the comments contained herein and to enact rules in accordance therewith.

Respectfully Submitted,

SOUTH CAROLINA JAIL ADMINISTRATORS
ASSOCIATION

Dated: July 6, 1992

BY:


Perry R. Eichor

SOUTH CAROLINA JAIL ADMINISTRATORS ASSOCIATION

Address: P. O. Box 10171
Greenville, S. C. 29603

Telephone: (803) 271-5260

South Carolina
Jail Administrators
Association Comments

CC Docket No. 92-77
Exhibit A
Page 1 of 12



Southern Bell

Carl E. Swearingen
Assistant Vice President

RECEIVED

Post Office Box 30188
Charlotte, North Carolina 28230
Phone (704) 378-8741

JUL - 7 1992

Federal Communications Commission
Office of the Secretary

March 1, 1989

RECEIVED

JUL 7 1992

FCC MAIL BRANCH

Mrs. Sandra J. Webster, Chief Clerk
North Carolina Utilities Commission
Post Office Box 29510
Raleigh, North Carolina 27626-0510

Re: Docket No. P-100, Sub 84

Dear Mrs. Webster:

Enclosed please find the original and 31 copies of the industry report requested by the Commission in its January 13, 1989 Order in the above captioned Docket. The report is the result of an industry conference held on February 17, 1989 in Raleigh and reflects the industry's recommendations on various issues with respect to pay phones in detention areas of confinement facilities.

I am also enclosing an extra copy of this letter which I would appreciate your stamping "Filed" and returning to me.

Thank you for your assistance.

Yours very truly,

Carl E. Swearingen
Carl E. Swearingen *CSH*

Enclosures

cc: All Parties of Record

JUL - 7 1992

**INMATE SERVICE
INDUSTRY REPORT**

Federal Communications Commission
Office of the Secretary

OVERVIEW

On February 17, Southern Bell chaired an industry conference to address COCOT service in confinement facilities, as ordered by the NCUC on January 13, 1989. At this conference, the industry discussed the requirements of the NCUC order of October 11, 1988 to determine how these requirements could be met. Attached is a list of industry members who were notified of the conference, a list of participants present at the conference, and the conference agenda.

Key points from this conference are listed below.

1. Despite the current restriction of collect only on most inmate lines, excessive toll fraud already exists due to ingenious schemes used by inmates to gain unauthorized access to toll networks. The volume of toll fraud would likely escalate if IXC's and LEC's were required to permit credit card calling from confinement facilities.
2. If sent paid calling were permitted from confinement facilities, losses due to unauthorized access to other services, "lost" coins, and/or fraudulent coin deposits would likely erode the revenue generated.
3. Due to technical limitations, some LEC's, and at least two IXC's, are unable to provide the specialized blocking and/or screening needed for inmate facilities.
4. The industry recommendation is that the collect only strategy currently utilized for lines in confinement facilities be applied to COCOT's in confinement facilities as well.

CREDIT CARD CALLS

A primary issue to the industry is the volume of toll fraud which would result from the requirement to allow inmates to place credit card calls. The parties at risk from this requirement would be the IXC's, the LEC's, and ultimately the general rate payers. Neither the confinement facilities management, nor the COCOT provider, would incur any financial risk if credit card calls were permitted in confinement facilities. Inmates presently use a multitude of creative methods to place fraudulent toll calls as described in the attached document on toll fraud. Due to the excessive volume of toll fraud which originates from

inmate facilities, the industry was in complete agreement that credit card calls should not be permitted from inmate facilities.

SENT PAID CALLS

Compensation to LECs and IXCs for sent paid calls (i.e., calls billed to the originating line), is the responsibility of the line subscriber. This applies to COCOT providers as well, making them financially responsible for sent paid calls initiated from COCOT phones in confinement facilities.

Because the intelligence to rate a call, as well as to collect/return coin deposits appropriately, is contained within the COCOT set itself (or in associated periphery equipment), 1+ sent paid calls (i.e., depositing coins to pay for the call) can be handled via COCOTs without any external operator system. However, since there is no provision for extending control of the coin collect/return capabilities to an associated operator system, COCOT originated sent paid calls which require an operator (0+ sent paid calls) are not feasible.

To limit their toll liability to LECs and IXCs to those 1+ calls which they can appropriately service, COCOT providers have traditionally subscribed to class of call screening to have operator-assisted sent paid calling blocked. This blocking is in the best interest of the COCOT provider (limited liability) as well as the LECs and the IXCs.

Although the COCOT provider is responsible for sent paid calls, allowing 1+ dialing from COCOT lines in confinement facilities provides an easy means for essentially uncontrolled network access and access to services such as 800, 900, 976, 950 (FGB), and 10XXX (FGD). In addition, it allows easy access for unauthorized use of individual customers' local and long distance lines. (See the attached paper for more details on fraud.)

Due to the potential for increased fraud risk associated with providing local and/or 1+ sent paid calling capabilities, it is the industry recommendation that all sent paid calls - local and toll, operator-assisted or not - be blocked from COCOTs serving confinement facilities.

BLOCKING & SCREENING PROVISIONING

Blocking and screening requirements raise the technical issue of how the appropriate blocking can be provided. Southern Bell provides selective screening and blocking through a combined process of class of service translations on the customer line along with transmission of a special information bit (ANI7). When the end office receives the call initiation, the class of

service coding reveals that an ANI7 must be sent with this call. The call is then sent with the ANI7 to either an IXC (interLATA calls) or to the LEC tandem office (intraLATA calls) for appropriate call processing. LECs use the ANI7 as an indication that special screening is required on the call. The degree to which the screening requirements can be customized, based on the originating line number, varies by LEC. Some are quite flexible, capable of associating any particular combination of screening restrictions with any particular line number. Others are able to screen any particular originating line number, but all screening must be with the same combination of restrictions. Because the screening occurs after interLATA calls have been sent to the appropriate IXC, LECs can provide additional screening for intraLATA calls only. The degree to which IXCs can apply any specialized screening, based on the originating line number, varies as does the LECs' capabilities.

Two IXCs indicated that they cannot currently provide this secondary screening table. Instead, one IXC suggested that the ANI7 code be further subdivided into three or four other information codes to indicate specifically which screening option was needed. Several LECs responded that the ANI7 process is hard wired into their switches, and, therefore, cannot be changed. In addition, altering the ANI7 method would require national agreement from all BOCs, LECs, and IXCs, an extremely lengthy process at best. Additionally, this same IXC indicated that a system update which could accommodate this secondary screening would be available for their switches in early 1990.

In light of the common use of the ANI7 and secondary screening table, the industry recommendation is to continue providing the screening through this method. Essentially, each LEC will provide the ANI7 digit to indicate the need for additional screening. It will be the responsibility of each party completing the call to properly handle the call. The inability to provide the additional screening will cause financial risk to the company completing the call, thereby giving that company incentive to either avoid solicitation of that business or to develop a method to provide the necessary screening.

RECOMMENDATION

Based on both the requests of some of the administrators responsible for confinement facilities, and the telecommunications industry's experiences with fraud losses, the public telephone service provided for the use of inmates in confinement areas should not be configured exactly like the public telephone service provided at other locations. It is the industry's recommendation that lines provided for COCOTS in confinement facilities be arranged to:

Allow:

0+ collect for local, intraLATA, interLATA calls

Block:

direct local dialing calls
credit card calls
3rd number charge calls
1+ sent paid calls
0+ sent paid calls
0- calls
00- calls
800 calls
900 calls
976 calls
950 calls
10XXX calls
inward calls (as an option)

Where the LEC can block additional digit dialing after initial call set up, then 1+ long distance and 7 digit local dialing could be permitted.

The following Interexchange Carriers, Resellers, and Local Exchange Carriers were invited to attend the Inmate Service Industry meeting on February 17, 1989:

Interexchange Carriers:

ITT/USTS

MCI (Under consideration, may file separately)

AT&T

US Sprint

Resellers:

Business Telecom Inc.

Econowats Inc.

TriTel

Mid Atlantic Telephone

PhoneAmerica of the Carolinas

SouthernNet Services

Local Exchange Carriers:

Southern Bell

ALLTEL Carolina

Contel of North Carolina Inc.

North State Telephone

Centel of NC/VA

Carolina Telephone and Telegraph

Concord Telephone

Lexington Telephone

General Telephone

Attendees of the Inmate Service Industry meeting held
February 17, 1989:

Southern Bell

AT&T

US Sprint

North State Telephone

Contel of North Carolina Inc.

Centel of NC/VA

General Telephone/South

ALLTEL Carolina

Carolina Telephone and Telegraph

Concord Telephone

Lexington Telephone

NORTH CAROLINA
TELEPHONE SERVICE PROVIDERS
PAYPHONES IN CONFINEMENT FACILITIES

February 17, 1989

| | | |
|-------|---------------------------------|--------------|
| 9:30 | Introductions | Fred Gurkin |
| 10:00 | Meeting Purpose | Bob Rudisill |
| 10:15 | Review of Commission Orders | Don Hathcock |
| 11:00 | Fraud Concerns | Fred Gurkin |
| 12:30 | Lunch | |
| 1:00 | Blocking Capabilities | Ed Griffin |
| 2:00 | Summary for Commission Response | Don Hathcock |
| 3:00 | Adjourn | |

INDUSTRY CONCERNS WITH PRISON FRAUD

LARRY KEPFER
CO-CHAIRMAN OF THE NATIONAL
TOLL FRAUD PREVENTION COMMITTEE

I. OVERVIEW

Institutional toll fraud presently generates an annual loss of \$150 million according to the Communications Fraud Control Association (CFCA), a national association of IXC's, LEC's, and law enforcement representatives. Included in the category of institutional toll fraud are educational facilities, military institutions, and prisons. Local exchange carriers and interexchange carriers have sought to minimize the fraud from inmate facilities through the provision of inmate service. Inmate service does not typically allow calls such as third party bill, access to Feature Group B (950) or Feature Group D (10XXX), 800 calls, 900 calls, 976 calls, direct dialed local calls, and credit card calls. Nonetheless, inmates still perpetrate fraud by using deceptive means to "Get By" the operator and access either services that require authorization codes (PINs or credit card numbers) or unsecured lines which give second dial tone.

II. WAYS FRAUD IS PERPETRATED BY INMATES.

A. PBX FRAUD

An example of PBX fraud is where an inmate calls a hospital and tells the operator "collect call from Dr. Jones." The PBX operator then accepts the call. The inmate will then ask for a department (i.e. radiology). When the department answers, he will explain that he was directed to the wrong department and requests to be connected to the operator again. When the operator is reconnected, he then asks for an outside line and dials his fraudulent call.

B. UNSECURED LINES and SECURED WATS LINES

Many large businesses have WATS lines that are dial accessed by their personnel. Some of these lines have authorization codes associated (secured lines), others just return a second dial tone when they are accessed (unsecured lines). The inmates will dial these numbers, tell the operator the call is from "John" and when the conformation or second dial tone is returned, the inmate will send a burst of DTMF to kill the tone before the

operator can hear it. They, in turn, either disguise their voice or hand the phone to another inmate who accepts the call. The Operator drops off and the inmate population has access to the dial facilities. If the line is secured, the inmates may "hack" the code until a valid authorization code is found or obtain a code via outside sources. They will have the ability at this point to dial their call on unsecured lines.

C. FEATURE GROUP A

Feature Group A fraud is perpetrated like the secured WATS lines. The inmates get to the carriers' facilities using the deceptive means previously mentioned, then input a stolen PIN and dial their call. Some Feature Group A lines also have the ability to reoriginate calls by using the # key. On completion of a call, the calling party presses the # key and the Feature Group A line returns dial tone and another call can be made without reentering the PIN. Unlimited numbers of calls can be made in this manner. To the LEC, it appears as only one call was made.

III. POTENTIAL HARM

A. CREDIT CARD CALLING

1. Inmates have many ingenious ways of illegally obtaining authorization codes, PINS, and Credit Card numbers. Allowing an inmate to make credit card calls would make the serving LEC and all IXC's very susceptible to fraud.
2. If an inmate were permitted to have a legitimate credit card, the card could easily be compromised within that facility. That inmate could sell calls to other inmates then report his card stolen.
3. Subscription Fraud (where a person orders service, runs up a large toll bill, then disappears without paying) would be a possibility where an outside source would order service under an assumed name, order a calling card, give the information to an inmate, then disappear. In the interim, the inmates could run up large volumes of fraud.

B. THIRD NUMBER BILLED

Third number billed calls would give an inmate an unlimited opportunity to place fraudulent calls with the

cooperation of friends at remote phones or other inmates. These calls could later be identified by the billed party as fraudulent at the expense of the LEC or IXC.

C. LOCAL CALLING

Allowing inmates to make local calls without operator control or without controlling the number of digits that they could dial, would give them access to local Feature Group A lines, dial access WATS lines, and also make the PBX fraud easily perpetrated. They would now be able to dial into the PBX without going through the operator and having a collect call accepted.

D. 1+ SENT PAID

Allowing 1+ sent paid traffic would also require controlling the number of digits the inmate could dial. With this stipulation, the potential for fraud would be minimized.

E. 0+ SENT PAID

Allowing 0+ sent paid traffic necessitates control of the 54 coin drop function at the coin set. Of course, this function is not under the operator's control, making 0+ sent paid calls totally unworkable from COCOT sets. Even at a LEC operated coin phone, an inmate could get the receiving caller at another coin set location to drop the coins at the receiving coin set. At those locations not utilizing electronic means to monitor and detect the point of origin of the coin deposit tones, the operator would be unaware that the coins were being deposited in the receiving set rather than by the inmate at the originating set. When a coin control signal is sent to collect the coins, it is applied only against the set originating the call. The receiving set would simply drop the coins back through to the coin return slot upon disconnect. When actual money in the collection box (originating set) is compared to the expected revenue (generated from AMA records), the shortage would be identified. Since it cannot be determined which calls created the shortage, recovery of this loss through rebill is impossible.

F. 10XXX DIALING

Allowing 10XXX dialing from inmate lines would make Interexchange Carriers, who cannot separate this type of traffic from POTS traffic, "fair game" for fraud. Some

interexchange carriers elected not to participate in balloting and allocation of BOC public phones because of inmate service and other services that require special screening.

IV. POSITIONS

A. NATIONAL TOLL FRAUD PREVENTION COMMITTEE POSITION

The Toll Fraud Prevention Committee, a national, industry-wide forum made up of all RBOCs, GTE, USTA, AT&T, MCI, US Sprint, Allnet, Bell Canada, Total-Tel USA, BellCore, Telus, and a number of other Interexchange Carriers, has had the Prison Fraud issue before them. This Committee has recommended that Inmate Service, regardless of the provider, allow 0+ Collect only. Deviance from this type of service will result in large amounts of fraud. TFPC issue 88-008 was agreement by the industry not to allow 10XXX dialing from inmate classes of service.

B. SUMMARY

The Communications Fraud Control Association (CFCA) estimates institutional fraud at \$150 million dollars annually. Because of this history, increased calling patterns made available to the inmates will increase the opportunities to commit telephone fraud. Secondly, when inmates perpetrate the fraud, there is not a means for restitution. Allowing inmates access to calling card services would allow them a much easier way of perpetrating the fraud. Allowing unrestricted local calling would give them access to services that would be compromised. It is strongly recommended that inmate service remain as 0+ Collect only. Additionally, 1+, 0-, and 00- sent-paid calls should be allowed only when access to 800, 900, 976, 950 (FGB), 10XXX (FGD), and the dialing of additional digits after the initial call set up can be totally blocked.

TELEPHONE MAP OF SOUTH CAROLINA

SOUTH CAROLINA
TELEPHONE
ASSOCIATION